

**FILED**  
NOV 05 2020

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**RONALD ALEXANDER  
RODRIGUEZ-PAZ,  
a/k/a "Ronald Alexander Paz-  
Rodriguez,"  
EVA ESTRADA JUAREZ,  
a/k/a "Eva Estrada,"**

**Defendants.**

) **Case No. 20-CR-00082-JED**  
)  
) **SUPERSEDING INDICTMENT**  
) **[COUNT 1: 18 U.S.C. §§ 1589(a),**  
) **1589(d), and 2 – Obtaining Forced**  
) **Labor;**  
) **COUNT 2: 18 U.S.C. §§ 1589(b),**  
) **1589(d), and 2 – Benefiting From**  
) **Forced Labor;**  
) **COUNT 3: 18 U.S.C. § 1584(a) –**  
) **Involuntary Servitude;**  
) **COUNT 4: 18 U.S.C. § 1590(a) –**  
) **Trafficking With Respect to Peonage,**  
) **Slavery, Involuntary Servitude, and**  
) **Forced Labor;**  
) **COUNTS 5-6: 42 U.S.C. § 408(a)(7)(B)**  
) **– Use of False Social Security Number;**  
) **COUNT 7: 18 U.S.C. § 1546(a)– Use or**  
) **Possession of False Immigration**  
) **Documents;**  
) **COUNTS 8-10: 18 U.S.C. §**  
) **1028A(a)(1) - Aggravated Identity**  
) **Theft;**  
) **Forfeiture Allegation: 18 U.S.C.**  
) **§§ 1594(d), 982(a) and 1028(b) –**  
) **Peonage and Slavery, Visa Fraud, and**  
) **Identity Theft Forfeiture]**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**[18 U.S.C. §§ 1589(a), 1589(d), and 2]**

From on or about July 1, 2019, through on or about December 13, 2019, more exact dates being unknown to the Grand Jury, in the Northern District of Oklahoma, the defendants, **RONALD ALEXANDER RODRIGUEZ-PAZ**, a/k/a "Ronald Alexander Paz-Rodriguez," and **EVA ESTRADA JUAREZ**, a/k/a "Eva Estrada," aiding and abetting

each other, did knowingly obtain the labor and services of D.Y.A., a minor child known to the Grand Jury, by any of the following means, and any combination thereof:

1. Force, threats of force, physical restraint and threats of physical restraint to her;
2. Serious harm and threats of serious harm to her;
3. The abuse and threatened abuse of law and legal process; and
4. One or more schemes, plans and patterns intended to cause her to believe that, if she did not perform such labor and services, she would suffer serious harm and physical restraint, and a combination of such means.

All in violation of Title 18, United States Code, Sections 1589(a), 1589(d), and 2.

**COUNT TWO**  
**[18 U.S.C. §§ 1589(b), 1589(d), and 2]**

From on or about July 1, 2019, through on or about December 13, 2019, more exact dates being unknown to the Grand Jury, in the Northern District of Oklahoma, the defendants, **RONALD ALEXANDER RODRIGUEZ-PAZ**, a/k/a “Ronald Alexander Paz-Rodriguez,” and **EVA ESTRADA JUAREZ**, a/k/a “Eva Estrada,” aiding and abetting each other, did knowingly benefit, financially and by receiving anything of value, from participation in a venture that had engaged in the providing and obtaining of labor of D.Y.A., a minor child known to the Grand Jury, by any of the following means, and any combination thereof:

1. Force, threats of force, physical restraint and threats of physical restraint to her;
2. Serious harm and threats of serious harm to her;
3. The abuse and threatened abuse of law and legal process; and
4. One or more schemes, plans and patterns intended to cause her to believe that, if she did not perform such labor and services, she would suffer serious harm and physical restraint; knowing and in reckless disregard of the fact that the venture had engaged in the providing and obtaining of labor and services of D.Y.A. by any of such means.

All in violation of Title 18, United States Code, Sections 1589(b), 1589(d), and 2.

**COUNT THREE**  
**[18 U.S.C. §§ 1584(a) and 2]**

From on or about July 1, 2019, through on or about December 13, 2019, in the Northern District of Oklahoma, the defendants, **RONALD ALEXANDER RODRIGUEZ-PAZ**, a/k/a “Ronald Alexander Paz-Rodriguez,” and **EVA ESTRADA JUAREZ**, a/k/a “Eva Estrada,” aiding and abetting each other, did knowingly and willfully hold D.Y.A., a minor child known to the Grand Jury, to a condition of involuntary servitude for a term.

All in violation of Title 18, United States Code, Sections 1584(a) and 2.

**COUNT FOUR**  
**[18 U.S.C. §§ 1590(a) and 2]**

From on or about January 1, 2019, through on or about December 13, 2019, in the Northern District of Oklahoma and elsewhere, the defendants, **RONALD ALEXANDER RODRIGUEZ-PAZ**, a/k/a “Ronald Alexander Paz-Rodriguez,” and **EVA ESTRADA JUAREZ**, a/k/a “Eva Estrada,” aiding and abetting each other, did knowingly recruit, harbor, transport, provide, and obtain D.Y.A., a minor child known to the Grand Jury, for labor and services in violation of Title 18, United States Code, Chapter 77, that is, involuntary servitude in violation of Title 18, United States Code, Section 1584, and forced labor in violation of Title 18, United States Code, Section 1589.

All in violation of Title 18, United States Code, Sections 1590(a) and 2.

**COUNT FIVE**  
**[42 U.S.C. § 408(a)(7)(B)]**

On or about September 14, 2016, in the Northern District of Oklahoma, the defendant, **RONALD ALEXANDER RODRIGUEZ-PAZ**, a/k/a “Ronald Alexander Paz-Rodriguez,” for the purpose of obtaining something of value and for other purposes, and with the intent to deceive, falsely represented on a rental application with Bristol Park Apartments that XXX-XX-9052 was the Social Security Number assigned to him by the Commissioner of Social Security, when in fact, as he well knew, such number was not the Social Security Number assigned to him by the Commissioner.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

**COUNT SIX**  
**[42 U.S.C. § 408(a)(7)(B)]**

On or about September 30, 2018, in the Northern District of Oklahoma, the defendant, **EVA ESTRADA JUAREZ**, a/k/a “Eva Estrada,” for the purpose of obtaining something of value and for other purposes, and with the intent to deceive, falsely represented on an Employment Eligibility Verification Form I-9 with Sonic Restaurants, Inc., that XXX-XX-2873 was the Social Security Number assigned to her by the Commissioner of Social Security, when in fact, as she well knew, such number was not the Social Security Number assigned to her by the Commissioner.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

**COUNT SEVEN**  
**[18 U.S.C. § 1546(a)]**

Between on or about September 14, 2016, and on or about December 13, 2019, in the Northern District of Oklahoma, the defendant, **RONALD ALEXANDER RODRIGUEZ-PAZ**, a/k/a “Ronald Alexander Paz-Rodriguez,” did knowingly utter, use, possess, obtain, and receive documents prescribed by statute and regulation for entry into and as evidence of an authorized stay and employment in the United States, that is, a lawful permanent resident card in his own name, which the defendant knew to be forged, counterfeited, and otherwise falsely made.

All in violation of Title 18, United States Code, Section 1546(a).



**COUNT EIGHT**  
**[18 U.S.C. § 1028A(a)(1)]**

On or about September 14, 2016, in the Northern District of Oklahoma, the defendant, **RONALD ALEXANDER RODRIGUEZ-PAZ**, a/k/a “Ronald Alexander Páz-Rodriguez,” did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, Title 42, United States Code, Section 408(a)(7)(B), as described in Count Five of this Indictment, knowing that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT NINE**  
**[18 U.S.C. § 1028A(a)(1)]**

Between on or about September 30, 2018, and on or about December 13, 2019, in the Northern District of Oklahoma, the defendant, **EVA ESTRADA JUAREZ**, a/k/a “Eva Estrada,” did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, Title 42, United States Code, Section 408(a)(7)(B), as described in Count Six of this Indictment, knowing that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT TEN**  
**[18 U.S.C. § 1028A(a)(1)]**

Between on or about September 14, 2016, and on or about December 13, 2019, in the Northern District of Oklahoma, the defendant, **RONALD ALEXANDER RODRIGUEZ-PAZ**, a/k/a “Ronald Alexander Paz-Rodriguez,” did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, Title 18, United States Code, Section 1546(a), as described in Count Seven of this Indictment, knowing that the means of identification belonged to another actual person.

All in violation of Title 18, United States Code, Section 1028A(a)(1).

**FORFEITURE ALLEGATION**

**[18 U.S.C. § 1594(d), 18 U.S.C. § 982(a), 18 U.S.C. § 1028(b)]**

The allegations contained in this Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 1594(d), Title 18, United States Code, Section 982(a) and Title 18, United States Code, Section 1028(b).

Upon conviction of the offenses alleged in this Superseding Indictment, as a part of their sentences, the defendants, **RONALD ALEXANDER RODRIGUEZ-PAZ**, a/k/a “Ronald Alexander Paz-Rodriguez,” and **EVA ESTRADA JUAREZ**, a/k/a “Eva Estrada,” shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations, and any property, real or personal, that was used or intended to be used to commit or to facilitate the violation of federal law. The property to be forfeited includes, but is not limited to:

**MONEY JUDGMENT**

A money judgment in an amount of at least \$6,600.00, representing proceeds obtained by the Defendants as a result of the offenses;

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the

jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 1594(d), Title 18, United States Code, Section 982(a) and Title 18, United States Code, Section 1028(b).

R. TRENT SHORES  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
RYAN H. HEATHERMAN  
Assistant United States Attorney

A TRUE BILL

/s/ Grand Jury Foreperson  
Grand Jury Foreperson